

Justin N. Rosas, OSB #076412

110 W. 11th St.

Medford, OR 97501

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEDFORD DIVISION

**ANDRE BILODEAU, ROBERT
BESSY, AMBER MCNAB AND
GREG KILLINGSWORTH,**
individuals, on behalf of themselves and
all others similarly situated; and DOES 1
through 100

Plaintiffs,

v.

CITY OF MEDFORD,

Defendant.

Case No. 21-766

**MOTION TO AMEND
COMPLAINT**

Come now, the Plaintiffs, by and through their counsel and files this motion to amend the complaint to add two additional plaintiffs and also to add additional claims and clarification. We have complied with the UTCR's by conferring on this amended complaint and the City, through Casey Murdock, objects to the amended complaint with regards to the claims but not with regards to the new plaintiffs. We conferred about this matter extensively prior to filing. We are attaching a copy of the amended complaints with markups for the changes. Many of the relatively few new claims are results of the new law that went into effect last year passed by the Defendant, some are on the basis of conversations with the American Civil Liberties Union about issues they have been

1 – Motion to Amend Complaint

hearing about from partner organizations in our area and a few are from stories we are hearing from our plaintiffs as well as other unhoused members of the community. These claims are issues that Defendant has been aware of and do not prejudice the Defendant in any way, further Counsel let Defendant know at the beginning of the case there would be additional claims once enforcement began. Should the Defendant need time to respond, that can be appropriately addressed at a status conference.

Respectfully submitted, this 15th day of April , 2022.

/s/ Justin N. Rosas
Justin N. Rosas
Attorney for Plaintiffs